 Shatila Food Products 8505 W. Warren Ave. Dearborn, MI 48126	Recall Plan	
	Document #: 7.1	Effective Date: 01/03/22
	Prepared By: Chelsie Romberger	Supersedes: N/A
	Approved By: Nada Shatila	Revision #: Original

Introduction

Included with the regulations mandated by the FSMA Act of 2011 is statute §117.139, which requires a recall plan be in place in the case that a company must recall products that they have sold to, or handled on behalf of, customers, or to comply with recall instructions from a supplier. The Shatila Food Products *Recall Plan (7.1)* has been developed to be compliant with FDA and State of Michigan guidelines, and to meet the standards of compliance for section 2.6.3 of the SQF Food Safety Code (Edition 9) to ensure ingredients and materials, WIP materials, and finished Mediterranean pastries and dessert products can be traced and recalled in an effective manner.

The *Recall Plan (7.1)* will be reviewed annually and revised by the Recall Team as necessary, such as when personnel, procedures, or other factors change. In addition to an annual review, regular testing of the plan will be performed in the form of mock recalls/traceability exercises to ensure that the plan in place is working as intended.

Scope

This plan applies to all situations where a product recall or withdrawal is required in addition to providing guidance for those actions to be performed during a mock recall.

Responsibilities

The Recall Team is responsible for performing recall activities and testing the recall plan effectiveness. The Recall Team is additionally responsible for making sure that employees know how to handle a recall situation prior to an actual recall event occurring. All employees are required to follow recall instructions as outlined by the Recall Team and Ownership.


Validation

The *Recall Plan (7.1)* is validated through the maintenance of an up-to-date Recall Team, current listings of customers and approved suppliers, and accurate contact information for regulatory bodies overseeing Shatila Food Products. Successfully performed mock recalls and traceability exercises also serve to validate the effectiveness of the *Recall Plan (7.1)*.

Verification

The *Recall Plan (7.1)* is verified through the following:

1. Documented review and necessary updates to the Recall Team.
2. Documented review and necessary updates of current customer contact information and approved supplier listing.
3. Documented review and necessary updates to contact information for the certifying body and other regulatory offices.

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4. Performance and complete documentation of mock recalls/traceability exercises. If mock recalls are able to account for 100% of the finished products, ingredients, and materials, (including shrinkage and waste) the *Recall Plan (7.1)* is considered both valid and properly functioning.
5. Review of training records and internal communications addressing recall, withdrawal, mock recall and traceability activities.
6. Documented Management Review for meetings addressing recall, withdrawal, mock recall and traceability activities.
7. Internal Audit review of the *Recall Plan (7.1)* and mock recall activities performed (at least annually).

Definitions

Product Recall: removal or collection from the channels of distribution of any ingredients and materials, WIP materials, and finished products deemed to be potentially hazardous or defective. A true recall of finished product, ingredients, or materials occurs only when the items violate legal standing and is a likely candidate for seizure, condemnation, or other legal action by the government. Finished products, ingredients, or materials may violate the law if it is "adulterated" or "misbranded". Whether a defect is likely to result in government action will depend on the manner in which the ingredients, materials, WIP materials, or finished products are affected and the potential risk to the public. Recall does not include a market withdrawal or a stock recovery.


Market Withdrawal: removal or collection from channels of distribution of any ingredients, materials, WIP materials, or finished products where no legal violations have occurred, or only minor violations that under normal circumstances would not be subject to legal action, e.g., normal stock rotation practices, incorrect barcode, tampering without evidence of manufacturing or distribution problems, etc.

Stock Recovery: removal or collection of ingredients, materials, WIP materials, or finished products which have not been marketed or that have not left the direct control of the company. For example, finished products on company-owned vehicles or in warehouses and are located on the premises owned by, or under the control of the company, and no portions of that lot have been released for sale or use.

Product Safety Investigation: internal trace of product origin/history prompted by notification by a reliable source of information that there may be a potential product safety or quality defect in a specific ingredient, material, WIP material, or finished product. The facts of the product safety investigation will determine if a product recall, market withdrawal or stock recovery is warranted.

Mock Recall: internal exercise used to establish the validity of the *Recall Plan (7.1)* and to test the company's ability to trace and recall ingredients, materials, WIP materials, or finished products. Mock recall exercises should be scheduled on an annual basis (at least) using differing scenarios. Exercises shall be documented to measure the effectiveness of the mock recall process then reviewed to identify and correct any internal problems discovered. Key elements of the mock recall documentation include scenario, time taken, accounting for affected product, documenting timeline, copies of documentation that show the traceback and any lessons learned from the exercise.

Recall Team

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The Recall Team is a group of key staff members with the expertise, authority, and responsibility to manage a recall situation. The Recall Team consists of one PCQI trained individual (the Vice President of Operations) in addition to representation of Senior Management and Ownership. All members of the Recall Team are employees capable of administering the system for tracking ingredients, materials, or finished products, assessing the scope of effected or potentially effected finished product or WIP materials, and possessing the knowledge of how to properly communicate with both commercial and regulatory entities on all topics involving the recall. New members may be added to the Recall Team at any point as long as they have documented training on recall procedures.

The members of the Recall Team perform a number of critical functions including, but not limited to:

- Collect and maintain the documentation of all recall decisions and actions in a master recall file
- Activate various components within Shatila Food Products for priority assistance
- Make recall decisions on behalf of Shatila Food Products
- Manage and coordinate the implementation of the product recall
- Keep management informed at all stages of the recall
- Notify relevant regulatory authorities
- Evaluate identified hazard and the extent of the contamination
- Notify insurers and legal counsel (if applicable)


Shatila Food Products Recall Team

PRIMARY	ALTERNATE
Recall Coordinator – Vice President of Operations	
Name: Nada Shatila Office Phone: (313) 934-1520 Cell Phone: (313) 618-1824	Name: Tania Shatila Office Phone: (313) 582-1952 Cell Phone: (313) 820-5352
Senior Management	
Name: Tania Shatila Office Phone: (313) 582-1952 Cell Phone: (313) 820-5352	Name: Nada Shatila Office Phone: (313) 934-1520 Cell Phone: (313) 618-1824
Operations Management	
Name: Steve Houtait Office Phone: (313) 934-1520 Cell Phone: (313) 570-0067	Name: Hala Baydoun Office Phone: (313) 934-1520 Cell Phone: (313) 903-0580
Quality Assurance	
Name: Khadijeh Bazzi Office Phone: (313) 934-1520 Cell Phone: (313) 522-5201	Name: Nada Shatila Office Phone: (313) 934-1520 Cell Phone: (313) 618-1824

Recall Team Individual Roles

Recall Coordinator (Vice President of Operations)

1. Upon receiving information that ingredients, materials, or finished products produced by Shatila Food Products could pose a potential health hazard to humans, or may be defective, the Recall Coordinator and


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the Recall Team will immediately begin investigating the suspected ingredients, materials, or finished products and the events leading to its suspected status. The Recall Team will determine if the product is indeed a potential health hazard and if a full-scale recall or product withdrawal should be initiated.

2. The Recall Coordinator will inform Senior Management and/or Ownership immediately, presenting all factual data regarding the suspected ingredients, materials, or finished products, and keeps them informed as events unfold regardless of whether a recall becomes necessary or not.
3. The Recall Coordinator maintains an official record of all activities related to traceback activity and recall events, should they become necessary.
4. The Recall Coordinator obtains and interprets all pertinent data and communicates directly with Senior Management and all other appropriate individuals as part of the Recall Team.
5. The Recall Coordinator provides other members of the Recall Team with necessary product information so that pertinent data can be collected. Data to be collected includes but is not limited to:
 - a. Production, packaging, and distribution data for the suspected lots of product
 - b. Inventory of the suspected products and lots that may remain at the Shatila Food Products facilities
 - c. Complete list of clients who were shipped suspected products
6. The Recall Coordinator will serve as the primary contact if it becomes necessary to involve a regulatory body in the recall process. The regulator must be given notification of the intent to initiate a product recall and must include:
 - a. Identity of the product involved
 - b. Reason for the removal or correction, and the date and circumstances under which the deficiency or possible deficiency was discovered
 - c. Evaluation of the risk associated with the deficiency or possible deficiency
 - d. Total amount of suspected lots produced and/or time span of the production and packaging
 - e. Total amount of the suspected lots estimated to be in distribution channels
 - f. Distribution information, including number of direct accounts and, where necessary, the identity of the direct accounts
 - g. A copy of the firm's Recall Communication if any has been issued, or a proposed communication if none has been issued
 - h. Proposed strategy for conducting the recall
 - i. Name, title and telephone number of the firm official who should be contacted concerning the recall
7. The Recall Coordinator shall prepare recall status reports as well as a final report at the conclusion of the recall process.

Senior Management

1. Shatila Food Products Ownership bears the ultimate responsibility for determining the necessity for a product recall. This decision should be made with the input of the Recall Team and legal counsel (as applicable).
2. Upon being informed that Shatila Food Products product poses a potential health hazard to consumers, Senior Management and Ownership will work with the Recall Team to determine the necessity for a recall as well as the potential recall classification and depth.
3. Instructs the Recall Coordinator to initiate a recall.
4. Maintains contact with legal counsel throughout the recall process.
5. Works to develop press releases/public statements as needed for recall processes.

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The Recall Plan

In the event that Shatila Food Products discovers, or is made aware of, contaminated finished products or ingredients and materials that require removal from the marketplace, the following actions are to be taken. The person receiving information about, or discovering, the need for recall must document the time and means by which the need for a recall was determined. This information must be communicated to Senior Management and/or Ownership and the SQF Practitioner as soon as possible following discovery. The local FDA district office may be contacted for information and assistance with recall processes. Shatila Food Products maintains a current *Emergency Contact List* (7.6) for all essential personnel so that all relevant individuals can be contacted on a 24-hour basis. Once a recall has been initiated, the Recall Team must perform a full traceability of affected items.

SQFI and the certifying body that audits Shatila Food Products against SQF standards must be notified within 24 hours of the initiation of a recall. Shatila Food Products must comply with all requests from SQFI and/or the certifying body to ensure the maintenance of certification status following the recall event.

Recall Coordinator for FDA District: Michael Larson

Phone: (313) 393-8118

Email: orahafeast6recalls@fda.hhs.gov

SQFI Contact:

Safe Quality Food Institute (SQFI) – foodsafetycrisis@sqfi.com

Certifying Body Contact: Bureau Veritas - Kimberly Knoll

Address: 16800 Greenspoint Park Drive, Suite 300 S Houston, TX 77060

Phone: 346-269-2991

Email: kimberly.knoll@bureauveritas.com


The Recall Coordinator or designee must also contact any affected customers and coordinate efforts to safely remove affected products from the supply chain and to address the safe, secure storage and disposal of recalled finished products, WIP materials, ingredients, or materials.

Determining the Need for Recall

Shatila Food Products will collect and analyze all information and data available regarding the ingredients, materials, and/or finished products that may be recalled. Shatila Food Products will take into account the following factors:

- Was there an issue with raw materials received from one or more suppliers?
- Has an adulterated finished product been distributed to customers?
- What is the time frame of shipments to customers?
- How many customers are in possession of the affected finished product, if any?
- Are finished products still within the established shelf-life?

If it is determined that a recall is necessary, then it will be classified as one of the following:

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- **Class I Recall:** A situation in which there is a reasonable probability that the use of, or exposure to, a non-conforming ingredient, materials, or finished product will cause serious adverse health consequences or death. Pathogens, undeclared allergens (per customer requirement), and physical hazards in the product would be given this classification depending on assessment of severity with consideration given to quantity of products distributed, extent of products consumed, age and health of the individuals exposed, etc.
- **Class II Recall:** A situation in which use of, or exposure to, a non-conforming ingredient, material, or finished product may cause temporary or medically reversible adverse health consequences or where the probability of serious adverse health consequences is remote. Pathogens, undeclared allergens (per customer requirement), and physical hazards in the product would be given this classification depending on assessment of severity with consideration given to quantity of products distributed, extent of products consumed, age and health of the individuals exposed, etc.
- **Class III Recall:** A situation in which use of, or exposure to, a non-conforming ingredient, material, or finished product is not likely to cause adverse health consequences. Adulterated or misbranded products that do not involve a health hazard would be given this classification. For example, undeclared certified colors, undeclared ingredients, or minor labeling problems.
- **Unclassified and Voluntary Situation:** A situation in which no violations are involved or are very minor in nature. Examples may include product quality, labeling, etc.

Scope of Recall

Shatila Food Products will assess the quantity of product that is implicated in a recall. If the event involves potential contamination or a pathogenic nature, the subsequent recall will include all materials utilized for the suspected lot of product, as well as any other product or materials that could have had cross contact with the suspected product. However, this information does not necessarily define the scope of all items to be recalled or withdrawn from the market. Determination of the scope of recall will include consideration of:


- Coding of product and batching assessment
- Issue causing the need for recall
- Processing methods, storage of finished products, and palletizing of orders for distribution
- Equipment utilized
- Monitoring and verification activities utilized during production

All recall activities will take into account the determined scope of the recall, and the Recall Team will communicate the identified scope effectively to all necessary regulatory bodies.

Depth of Recall

The depth of a recall depends on the degree of hazard, the extent of distribution, and the level to which the recalled finished products were distributed. Levels of recall depth are categorized as:

- A *Class 1 Recall* shall be made to the user levels (if possible), including retailers, foodservice suppliers, brokers or distributors.
- A *Class 2 Recall* shall be made at the foodservice supplier level, including any intermediate brokers or distributors.
- A *Class 3 Recall* shall be made at the foodservice supplier level.

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Affected Products

The procedure for finished product retrieval can be divided into different components including removal, control, and disposition of affected products.

Removal

All reasonable efforts must be made to remove affected finished products from the supply chain. All affected finished products will be detained, segregated, and handled in a manner determined by the recalling firm. The customer is contacted and asked to identify a shipment received from Shatila Food Products as well as how much inventory is remaining. Identification can come from receiving date, manufacturing/shipping date, or lot code. Obtain written confirmation of products sold and product remaining from the customer holding the product.

If ingredients, materials, or finished products are still in the recalling firm's control (e.g., inventory located onsite, in transit, etc.) they will be placed on immediate hold, detained, and segregated. For finished products outside the company's possession, Shatila Food Products will instruct the customer to isolate the product and clearly label the product as 'On Hold'. Shatila Food Products will tabulate finished products on hold and evaluate relative to the total amount of potentially contaminated finished products distributed. Shatila Food Products will strive to recover as many finished products as possible. The Recall Team will assist investigative agencies in obtaining samples for testing and analysis.

Control


If Shatila Food Products chooses to retain recalled finished products, control must be regained to prevent reentry of the products into the supply chain. Shatila Food Products will request a recall of all products from all customers holding products from the affected lots. All affected products returned to Shatila Food Products will be clearly marked "not for sale or distribution" and stored in a designated area that is separated from any ingredients, materials, and non-affected finished products. Any unused or undistributed finished products from the same contaminated batch is to be segregated from regular storage areas to prevent accidental use. Until the cause of issue is determined, hold all orders to ensure current procedures are being followed and maintained to a high standard. As Shatila Food Products regains control of recalled products, all quantities and identification codes shall be documented to assist in the reconciliation of product quantities.

Disposition

The final disposition of the recovered products must be determined. The final disposition must be reviewed and approved by regulatory agencies overseeing the facilities. Options include:

- **Redirection** – Products may be redirected for uses other than human food.
- **Destruction** – Products determined to be unsafe for use as human food may be destroyed or further denatured and disposed of by appropriate means.
- **Recondition** – Products may be reworked to remove the safety risk. For example, relabeling or re-packaging of products to declare an allergen originally omitted from the label.

The recall is terminated when all involved regulatory bodies and the recalling producer agree that the recalled product has been removed from the supply chain, and that the proper disposition and/or corrective actions have been completed.

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Records

Company records are maintained by Shatila Food Products and are kept for a period of time that exceeds the expected use of product and in accordance with the SQF Food Safety Code for Food Manufacturing and contain the following information:

- Positive identification of received ingredients and materials
- Lot information for WIP or packaged finished products and other identifiers/coding
- Distribution records (e.g., bills of sale, invoices, shipping papers, etc.)

Recall Communications

All information received and communication released regarding the recall will be approved by the Recall Coordinator under the supervision of Ownership. Communication is critical in a recall situation to the point that the members of the Recall Team may need to devote nearly full time to the emergency. Copies of all communications will be kept on file with the rest of the recall information.

Notification

The initial notification of a potential health hazard can come from a variety of sources including the FDA, Shatila Food Products customers or employees, contracted third parties or raw material suppliers. Regardless of the source, all inquiries should be routed immediately to the Recall Coordinator. If the Recall Coordinator is off site, they will be immediately contacted via phone or other means of communication and informed of the situation. In those instances when the Recall Coordinator is unavailable or unable to be contacted, the alternate, currently the Vice President of Sales/Marketing, will assume responsibility for addressing the initial notification.


Recall Communication Implementation

Shatila Food Products will attempt to contact all consignees via phone, e-mail, and fax (in order) until a point of contact receives and acknowledges communication. In addition, all consignees or customers shall be contacted via special delivery letters conspicuously marked (on the letter or envelope) “URGENT – PRODUCT RECALL.” Follow up communications shall be sent to consignees who fail to respond to initial recall communications within 24 hours.

Recall Communication Content

All recall communications will be written in accordance with the following guidelines:

1. Brief and to the point
2. Clearly identify the product and other pertinent, descriptive information, including:
 - a. Product code
 - b. Quantity/volume of products
 - c. Packaging date
 - d. Lot coding or identifying information
3. Describe the risk involved in consuming the affected product
4. Concisely explain the reason for the recall and the hazard involved

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5. Provide specific instructions on how to handle the recalled product
6. Request an official, written statement from consignees (if applicable)
7. Provide a means for consignees (and other communication recipients) to report whether or not they have any of the recalled product under their control
8. Include contact information and a point of contact at Shatila Food Products

Fact and Data Acquisition

In the initial conversation with the person/persons identifying the potential need for recall, the Recall Coordinator will ascertain the available facts associated with the potential hazard. Regardless of where the issue originates, the Recall Coordinator will keep careful, detailed notes of the initial conversation and all subsequent activities associated with the traceback/recall process. The Recall Coordinator will include in these notations the time and date of each event to aid in the preparation of a final report and measure the effectiveness and timeliness of the response. Facts and information to be documented will include product type and label, product codes, type of defect or hazard, invoice numbers, customers, and number of persons affected. The Recall Coordinator will also obtain the name, agency and contact information for the person making the notification. If the notification is coming from a regulatory agency, it is important to determine the status of the investigation.

The Recall Coordinator will also inquire as to whether other Mediterranean pastries and dessert products are being investigated as a source of the hazard and if other companies have been contacted. Often in the initial stages of a safety or epidemiological study more than one potential source is under consideration.

If the potential hazard is due to physical or chemical rather than biological contamination, i.e., pieces of glass, metal, wood, contamination with chemical agents, the Recall Coordinator should attempt to attain a sample of the physical hazard to assist in the internal investigation. The sample can be used in tracing the origin of the contamination, determining how the problem arose and developing procedures to mitigate future contamination.


Regardless of the nature of the potential hazard (physical, chemical or biological), the notification that a potentially widespread hazard exists and is of concern to a regulatory body or a customer, will trigger an internal investigation by the Shatila Food Products Recall Team.

Returned Product Control and Disposition

Shatila Food Products will specify how the recalled product will be disposed of and how it will be controlled, pending disposition. Both local and state regulators should be notified prior to disposition actions, which may include destruction or reassignment of product that is returned. If the product is destroyed, it will be rendered unfit for human consumption. All labeling will be marked unusable for trade.

Recall Simulations or Traceability Exercise

In order to be able to efficiently and effectively recall any products that are found to be a health and safety risk to the public, Shatila Food Products employs a Mock Recall/Traceability Plan that is tested regularly. Recall exercises are performed against randomly selected lots of raw materials or finished product, and results are recorded by the Recall Coordinator, or a designee. Exercises should be performed for the assessment of raw

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materials tracing and finished product tracing for a calendar year. Each simulation will be conducted without prior notice and will include at least one lot of products released to customers. The simulation should be treated as a real event and should be conducted to the point where communication is made with customers and will include hypothetical discussions of product custody and disposition. All relevant documentation will be collected by the Recall Team including invoices, bills of lading, inventory listings, production schedules, and pertinent product safety and quality documentation. The potential need for external advice or services (e.g., consultants, laboratories, lawyers, public relations personnel, etc.) will be assessed during the exercise.

For all mock recall exercises, the Recall Team needs to present contact information of all parties that would be affected by the recall, including regulatory bodies. Shatila Food Products shall utilize procedures, records and product coding information to enable a one-step-forward and one-step-back traceability of products, packaging or other raw materials used. Also required in the recall exercise is a documented discussion of how products would be controlled by Shatila Food Products or the affected customers, logistics of taking control of affected products already distributed, and how disposition would be handled. All simulations will be kept on file and will include the following:

- Name, address and telephone number of consignees (of the simulated lot)
- Inventory
- Distribution of the test lot

Traceback Review

The Recall Coordinator will reassemble the full Recall Team for a review of the traceback activity. The review will include the results of the traceback, a summation of the traceback and safety-related documentation and any further communications between the Recall Coordinator and the investigating agency or customer. This meeting will then move to a discussion and determination of next steps. The issues to be decided include:


- Should current product distribution be halted?
- Is a recall, market withdrawal or stock recovery warranted?
- If a recall is necessary, what classification, and what is the appropriate depth of recall?
- If the regulatory offices are not involved at this point, do they need to be notified?
- What further steps does Shatila Food Products need to take in its internal investigation?
- Should the corporate insurance carrier be notified?
- What is the message Shatila Food Products wishes to convey to the media, customers and employees?

Communication with the media, customers and employees is always a critical issue during a potential hazard situation. It is important that the message be clear, concise and factual. It is equally important that the company uses a single spokesperson so that the message stays consistent.

If A Product Recall Is Not Warranted

A product traceback activity may have a number of different outcomes depending on the nature of the event and findings during traceback. The following are potential end scenarios of a traceback investigation:

- It is determined that the nature of the potential hazard does not pose a public health risk.
- The source of the contamination cannot be unequivocally determined by regulatory agency
- Shatila Food Products product is found not to be the source of the contamination

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In instances when a recall is not appropriate, the focus of Shatila Food Products efforts will be directed toward assisting investigating government agencies and/or customers in isolating the likely source of the contamination and evaluating mechanisms to prevent further occurrences. The Recall Coordinator will continue to work with suppliers, customers, vendors and regulatory agencies to establish the likely cause of the problem and develop preventative measures. This activity will culminate in a final report that will be reviewed with the full Recall Team. The report will outline any changes to be made to safety and quality programs.

Mock Recall Procedure

The expectation for recall exercises (both mock recall and actual) is the ability to recover/locate and account for 100% of implicated finished products. Use the *Recall Reporting Form (7.2)* for documentation of exercise.

1. Gather participants into the conference location or adjacent offices (this may also require that participants be gathered virtually if necessary). Participants should include the Recall Team and alternate team members. The intention to perform a mock recall exercise may be announced ahead of time, though the scenario is more realistic if little to no notice is provided ahead of the meeting.
2. Present a scenario involving the need to recall products for a reason that is realistic for Shatila Food Products. Be sure to announce that it is a mock recall, and make sure any written documentation used to assist in the recall exercise clearly states that it is intended as a scenario used for training only (an inspector or auditor may not be able to determine that the recall is fake if the attempt to simulate a real event is too aggressive).
3. The most important activity during a recall is to establish clear documentation for every change of custody for each recalled lot of products. When the exercise is announced, let the team know either a range of dates for which recalled product should be determined, or pick a specific lot and have them trace the product from production through to the customer.
 - a. Even if the team members simulate these activities, and do not actually contact someone, they should be able to communicate who they would contact, and they should have the phone numbers and email addresses ready at the closing.
4. Make sure each participant understands their role in the recall event (this should be what they would do during a real recall). Make note of the start time of the exercise.
5. The mock recall exercise must include the contact information for each regulator, customer, third party audit body, third party warehouse, and supplier who will be involved in the event.
6. When everyone is ready to present, bring everyone back together and discuss the findings. Make note of the end time.
7. Make sure part of the final process is a discussion of who would take possession of product that is being recalled and discuss what warehouses would be used if Shatila Food Products is responsible to take possession, and where the packaged finished product would be disposed of.
8. After the event is complete, task a team member with doing a write up, which should include all gathered documents, an assessment of whether the recall was performed within the time limit, and any improvements that can be made for the next exercise.

If unacceptable results occur during the mock recall, a corrective action must be undertaken including at minimum: identify the reason this occurred, a reassessment of recall procedures, updating monitoring programs

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for tracking information, and the retraining of employees. Furthermore, if the mock recall fails, it must be repeated until acceptable results are obtained. The follow up must verify the changes were effective in correcting the deficiencies in the program.

Notes:

- Attach copies of those records used in the course of the mock recall exercise to the *Recall Reporting Form* (7.2) and maintain according to record retention policy.
- Ensure that all key documents used in a mock recall clearly state “Mock Recall” on them so they will not be confused with the events of an actual recall.
- Do not call customers or suppliers when carrying out mock recall exercises unless they have offered this service. Mock recall exercises may be taken so far as providing the contact details of each applicable entity.
- Choose mock recall scenarios which are realistic and challenging, and provide a different scenario each time, within reason, so that over time the complete range of products, sources, and potential issues for the facilities can be covered and the system tested in as many ways as possible.